

EXHIBIT "2"

From: [Matthew Baumgartner](#)
To: [Robert MacNaughton](#); [Brooke Wilhelm](#); [Weston Ray](#); [Guillermo Alarcon](#)
Cc: ["John Lyons"](#); [Martha Adams](#)
Subject: RE: Robert MacNaughton shared "2627 Main Discovery" with you.
Date: Tuesday, May 16, 2023 3:51:33 PM
Attachments: [image010.png](#)
[image011.png](#)
[image012.png](#)
[image013.png](#)
[image014.png](#)
[RE_FAH22004012_Grant Meadows-Revised Commitmen....pdf](#)

Robert-

Unfortunately, Defendant's document production is not usable and we need to request that the documents be reproduced in a way that preserves the documents' original content (including the metadata and families). The manner in which Defendant has produced documents does not preserve the metadata and does not (unless we attempt to keep them together on our end) keep the families (emails and their attachments) together in the Bates numbering.

As an example, if you open the attached production PDF you can view the email and it is Bates endorsed, but the filename does not contain the Bates number. You can then click on the attachment icon (paper clip) and view the attachment and it is not Bates endorsed.

Defendant's production did not include a file containing the Bates numbers and metadata.

In contrast, the KH production contains the following metadata fields:

- BegBates
- EndBates
- BegAttach
- EndAttach
- SortDate (this date is populated the same for parent emails and any attachments)
- SentDate
- ReceivedDate
- LastModifiedDate
- From
- To
- CC
- BCC
- Subject
- FileName
- FileExt
- Author
- NativeLink (Link to the produced native files)

If possible, it would be best to receive Defendant's production in the same format as KH's, which meets the minimum standards for production of electronically stored documents.

I have cc'd John Lyons to work with whomever is creating Defendant's production to ensure it is received as expected. Please provide the best contact for John to work with on this.

Sincerely,

Matthew Baumgartner	
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EXHIBIT "2"



From: Robert MacNaughton <robert@porterfirm.com>

Sent: Monday, May 15, 2023 7:30 PM

To: Brooke Wilhelm <lawclerklit@porterfirm.com>; Robert MacNaughton <robert@porterfirm.com>; Weston Ray <weston@porterfirm.com>; Guillermo Alarcon <GAlarcon@abaustin.com>; Matthew Baumgartner <MBaumgartner@abaustin.com>

Subject: Robert MacNaughton shared "2627 Main Discovery" with you.



Robert MacNaughton shared a file with you

Defendant Document Production Cause No. 4:22-CV-3730

If you have an issue let me know. Bates Labels are without prefix identifiers - wanting to get the documents to you timely.



[2627 Main Discovery](#)



This link will work for anyone.

EXHIBIT "2"

From: [Travis Huehlefeld](#)
To: [Avant, Lolly](#); [Joshua Bernstein](#)
Cc: [Rebecca Brown](#); [Jonathan Daniel](#); [ltorrado@knighthead.com](#); [Brian H. Buster](#); [Ebbs, Mary](#); [RMB-TeamAvant](#); [Shahin Jamea](#); [Sara Prasatik](#)
Subject: RE: FAH22004012|Grant Meadows-Revised Commitment and Owner's Proforma
Date: Monday, October 24, 2022 5:36:06 PM
Attachments: [Supplemental Title and Survey Objection Letter \(WCG 10 24 2022\)\(1218045.pdf\)](#)

Lolly/Josh – Please find attached Purchaser's supplemental title objections based off of the revised title commitment received today. Please let me know if you have any comments.

Thank you,

Travis

TRAVIS L. HUEHLEFELD | Attorney

Wilson Cribbs + Goren | 2500 Fannin St | Houston, TX 77002

713.222.9000 (O) | 713.547.8516 (D) | 713.229.8824 (F)

thuehlefeld@wcglaw.com | www.wcglaw.com | [vcard](#)

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From: Avant, Lolly <LAvant@fnf.com>

Sent: Monday, October 24, 2022 12:22 PM

To: Rebecca Brown <Rbrown@knightheadfunding.com>; Brian H. Buster <bbuster@legalstrategy.com>; Joshua Bernstein <jbernstein@legalstrategy.com>; 'Shahin Jamea' <sjamea@oxberrygroup.com>; Travis Huehlefeld <tHuehlefeld@wcglaw.com>; Sara Prasatik <sprasatik@wcglaw.com>

Cc: Ebbs, Mary <Mary.Ebbs@fnf.com>; RMB-TeamAvant <RMB-teamavant@fnf.com>

Subject: FAH22004012|Grant Meadows-Revised Commitment and Owner's Proforma

This message was sent securely using Zix[®]

Good Afternoon,

I have revised the survey reading for Exception M, Item (f) in the title commitment and Owner's proforma.

Please let me know if you have any questions and if we are targeting October 28th for the closing date.

My office will be circulating a closing statement by tomorrow. Please provide any outstanding invoices and wiring instructions.

Thank you,

Lolly Avant, SVP

National Business Development|Senior Closer

Fidelity National Title

National Commercial Services

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Houston, Texas 77027

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